



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV**

Subject: **POLREP #5**
Temporary demobilization and Return
Burlington Industries Cheraw
B49F
Cheraw, SC
Latitude: 34.6977213 Longitude: -79.9146074

To: James Webster, USEPA R4 ERRPB

From: Matthew Huyser, On Scene Coordinator

Date: 7/13/2017

Reporting Period: 6/30/2017 - 7/13/2017

1. Introduction

1.1 Background

Site Number:	B49F	Contract Number:	
D.O. Number:		Action Memo Date:	4/25/2016
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/5/2017	Start Date:	6/6/2017
Demob Date:		Completion Date:	
CERCLIS ID:	SCN000404896	RCRIS ID:	
ERNS No.:		State Notification:	10/4/2016
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The South Carolina Department of Health and Environmental Control (DHEC) conducted sampling under a Preliminary Assessment (PA) and discovered the presence of Polychlorinated Biphenyls (PCBs) in residential and industrial surface soils near the former Burlington Industries facility, as well as in the drainage ditch and surface water corridor to the Pee Dee River. Public and private properties throughout the surface water corridor. An Action Memorandum for initial time-critical removal action was signed on April 25, 2017. Initial activities include cleanup to address at least six residential properties with concentrations of PCBs greater than 10 times the respective EPA Region 4 Removal Management Level (RML).

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2015 for detailed information on this section.

1.1.2.1 Location

The former Burlington Industries facility is currently owned by Highland Industries, Inc. and is located at 650 Chesterfield Highway, Cheraw, Chesterfield County, South Carolina.

1.1.2.2 Description of Threat

Part 302.4 of Title 40 in the Code of Federal Regulations lists PCBs as a hazardous substance under section 102(a) of CERCLA, a toxic pollutant under section 307(a) of the CWA, and as a hazardous air pollutant under section 112 of the CAA. PCBs are also listed as a toxic chemical through section 313 of EPCRA and determined to present an unreasonable risk of injury to health and or the environment under section 2605(e) of the Toxic Substances Control Act (TSCA).

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2015 for detailed information on this section.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

PCB Aroclors 1248 and 1254 were found throughout the Site with highest concentrations near the ditch at the west boundary of the former Burlington Industries facility, followed by decreasing concentrations throughout the surface water drainage corridor.

See Pollution Report (POLREP) #1 - Initial POLREP, dated June 7, 2015 for detailed information on this section.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On June 30, ERRS crews demobilized from the Site for the Fourth of July holiday; large equipment was left at the Site to reduce demobilization costs.

On July 3, laboratory results were received from confirmation samples that had been collected from 244 and 246 Pecan Drive. The data was provided to EPA Scientific Support Section for review which provided the recommendations that have been listed in Section 2.2.2

ERRS crews re-mobilized to the Site on July 9 and resumed operations on July 10. Rain water that had accumulated in excavated areas that were cleared by confirmation samples was pumped and discharged to the ditch. Backfilling was initiated in areas that had been cleared by confirmation samples and additional excavation was initiated. The additional excavation in the northeast corner of 244 Pecan Drive was completed on July 11 and a new confirmation sample was collected (backfilling will not occur until confirmation sample results are received). Additional excavation in the northeast corner of 246 Pecan Drive was completed on July 12 and backfilling continued in that area.

A continuous silt fence was installed at the back of the first three properties where backfill installation has been completed, set back approximately 5-10 feet from the ditch, to discourage migration of sediment from the ditch to the residential yard in the event that a flooding event occurs prior to remediation of contaminated soils in the ditch. Sod installation began on July 11 at the first three properties and will be completed by July 14.

Removal of playground equipment components in Huckleberry Park which were set in concrete began on July 12. Concrete was manually removed from the equipment and the parts were relocated to a staging area at the former Town of Cheraw Public Works facility. Excavation and removal of sand in play areas was initiated on July 12 and will be complete by the end of the day on July 13. Perimeter barriers around play areas are also being removed and relocated to the former Public Works facility.

Approximately 405 tons of non-TSCA PCB soil will be loaded for transportation and disposal to Lee County Landfill in Bishopville, SC from July 10 to 11.

START continued to delineate and mark excavation areas based on digital maps and locations representing sample results from DHEC and EPA samples that were collected. Clearance samples for 244 Pecan Drive were collected and sent for laboratory analysis on July 11.

Cleanup criteria remains at 1,000 ug/kg and soils with total PCB concentrations in excess of 50,000 ug/kg are excavated separately and staged for disposal in a segregated stockpile.

2.1.2 Response Actions to Date

232 Pecan - Excavation and backfilling 100% complete. Sod 80% complete
234 Pecan - Excavation and backfilling 100% complete. Sod 30% complete
238 Pecan - Excavation and backfilling 100% complete. Sod 30% complete
244 Pecan - Excavation 100% complete. Awaiting clearance sample results. Backfilling 50% complete.
246 Pecan - Excavation 100% complete. Backfilling 50% complete
252 Pecan - Delineation complete. Brush and debris cleared

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Enforcement and negotiation activities are ongoing

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Brush		24.32 tons			Local Class II (C&D) Landfill
Non-TSCA Soil		1795.39 tons			Lee County Landfill, SC
TSCA PCB Soil		715.99 tons			Wayne Disposal #2 Landfill, MI

2.2 Planning Section

2.2.1 Anticipated Activities

The current time-critical removal action is targeted at occupied residential properties which have PCB concentrations that exceed 10 times the EPA Region 4 Removal Management Level ("Tier I") as well as areas of Huckleberry Park that exceed the PCB RML ("Tier II"). An additional residential property which is classified as a Tier II parcel but is located between two Tier I parcels will be addressed as part of this removal action (See section 2.2.2)

2.2.1.1 Planned Response Activities

- Excavate surface soils and contaminated with PCBs from residential properties which meet Tier I criteria; (ONGOING)
- Remove play units and sand from Huckleberry Park; (ONGOING)
- Provide temporary staging of excavated PCB-contaminated soil/sediment between removal and disposal activities; (ONGOING)
- Load and transport PCB-contaminated soil/sediment to an offsite location for treatment and/or disposal; (ONGOING)
- Replace excavated soil with clean backfill and vegetation; and (ONGOING)
- Restore impacted properties to the extent practicable. (ONGOING)

2.2.1.2 Next Steps

Excavation will begin at 248 and 252 Pecan Drive.

Backfill will be completed at 244 and 246 Pecan Drive, pending receipt and review of confirmation sample

results.

Excavation will be completed at Huckleberry Park. Sod installation will be completed at 232, 234, and 238 Pecan Drive.

2.2.2 Issues

A change of scope action memorandum was prepared to conduct removal activities at 248 Pecan Drive which had been classified as a Tier II property but is located between two Tier I properties and provides no future access path without a) risking damage to the main structure on the property; or b) risking cross contamination on adjacent properties which will have already been remediated. Prior to signature of the action memorandum, verbal approval was received to proceed with removal activities at 248 Pecan Drive. OSC Huyser met with the property owner on July 10 and the tenant on July 11 to discuss details of the removal action and which items within the property would be removed or relocated by either EPA or the tenant.

START is delineating and marking excavation areas based on digital maps and locations representing sample results from DHEC and EPA samples that were collected. Excavation is being conducted in 6-inch "lifts". EPA samples provide a higher density of sample location but lower accuracy at low concentrations. Composites of the EPA samples were sent for laboratory analysis to verify the screening method and provide way to generate a correction factor. The composites were created based on relative screening concentration and geographical location at the Site, thus the laboratory results also provide a description of the PCB concentration in the area represented by the composite. Interpretation of these results and translation to an excavation area is not simple and requires understanding of the source and limitations of the material. A report will be generated and submitted to the Site File which will document the method used for validation and interpretation.

All clearance sample were received for 244 and 246 Pecan Drive by July 3. All data, including aliquot depth for the composites, were provided to the EPA Region 4 Scientific Support Section for review. Of the six samples collected, four showed PCB concentrations below or equal to the target cleanup goal of 1,000 ug/kg and were determined to have met this cleanup target. One sample representing an area of the northeast corner of 246 Pecan Drive had a total PCB concentration of 3,500 ug/kg and it was recommended to continue excavation in the area to a minimum overall depth of 12 inches and provide a clean backfill of 12 inches or more in this area. One sample representing an area in the northeast corner of 244 Pecan Drive had a total PCB concentration of 26,000 mg/kg and it was recommended to continue excavation in this area then resample for confirmation of whether the cleanup goal had been achieved.

2.3 Logistics Section

No information to report in this section

2.4 Finance Section

2.4.1 Narrative

An action memorandum was signed on April 25, 2017. Funding has been provided for ERRS and START contracts in the amount represented in the table below.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$799,441.00	\$502,138.08	\$297,302.92	37.19%
TAT/START	\$50,000.00	\$22,000.00	\$28,000.00	56.00%
Intramural Costs				
Total Site Costs	\$849,441.00	\$524,138.08	\$325,302.92	38.30%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

ERRS and START have each produced a HASP for their activities.

2.5.2 Liaison Officer

No information to report in this section

2.5.3 Information Officer

No information to report in this section

3. Participating Entities

3.1 Unified Command

No information to report in this section

3.2 Cooperating Agencies

4. Personnel On Site

EPA (1)
ERRS (9)
START (1)
DHEC (1 intermittent)

5. Definition of Terms

No information to report in this section

6. Additional sources of information

6.1 Internet location of additional information/report

No information to report in this section

6.2 Reporting Schedule

POLREPs will be generated and submitted weekly

7. Situational Reference Materials

No information to report in this section